

**UNITED STATES U.S. DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ERIKA LEE,

Plaintiff,

v.

DELTA AIR LINES, INC., DAVID NEEDHAM
& JOSE ROSADO,

Defendants.

Civil Action No. 1:22-cv-8618-DEH-RWL

EXHIBIT C

TO

DELTA'S LETTER

DATED

'O c{ '43.'4247"

Fleming, Michael F.

From: Erika Lee <leerikalatise@gmail.com>
Sent: Monday, May 19, 2025 12:34 PM
To: Fleming, Michael F.
Subject: Lee v. Delta - Documents and Deposition
Attachments: IMG_7054.jpeg

[EXTERNAL EMAIL]

Hello,

I do not have any additional communications. However I attached the March 30 email which can perhaps be considered “additional,” as I had to click on it to confirm and that was it . This is all I have. So if you aren’t satisfied , go see the judge, as I can’t provide you with anything else , as I do not possess any “additional” communications. Do not email me again about this and ask again as I DO NOT POSSESS ANY ADDITIONAL written COMMUNICATION documents. I’m not repeating myself again. So any future emails with this redundant, futile request will be ignored. Thank you. See attached document.

On Monday, May 19, 2025, Fleming, Michael F. <michael.fleming@morganlewis.com> wrote:

Ms. Lee,

The testimony I am referencing appears on pages 368 and 369 of the transcript of your deposition. You confirmed that there are additional communications regarding your April 4 visit available by clicking on the links embedded in the March 30 email. You have not provided any of those communications, although you have been twice ordered by the Court to do so. Those communications (and any others you have regarding the April 4 visit) must be produced by tomorrow (May 20).

As requested below, by tomorrow, please also provide all dates you are available in June to be deposed.

Michael F. Fleming

Morgan, Lewis & Bockius LLP

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michael.fleming@morganlewis.com | www.morganlewis.com



From: Erika Lee <leeerikalatise@gmail.com>
Sent: Friday, May 16, 2025 1:50 PM
To: Fleming, Michael F. <michael.fleming@morganlewis.com>
Subject: Re: Lee v. Delta - Documents and Deposition

[EXTERNAL EMAIL]

I complied . I have no other documents and/or communications in my possession. You are intentionally and fraudulently misrepresenting my alleged testimony. Can you cite a page and paragraph number please of this alleged testimony ? Please advise . Thanks.

On Friday, May 16, 2025, Fleming, Michael F. <michael.fleming@morganlewis.com> wrote:

Ms. Lee,

The additional screenshot you provided does not satisfy your court-ordered obligation to produce “all documents (including but not limited to email and other electronic information) concerning [your] April 4 appointment” (Order, dated April 15, 2025) and the “the complete, un-cropped string of communications that includes the cropped screenshot Lee provided to Delta regarding her medical appointment” (Order, dated May 13, 2025). You testified during your deposition that the March 30 email linked to another communication that provided additional information regarding your appointment. The Court has overruled your objection to producing those communication. (See Order, dated May 13, 2025, at p. 3 (“Lee’s objections based on HIPPA and doctor-patient privilege are overruled consistent with the foregoing.”).) That communication, along with all other communications with your medical provider regarding the April 4 appointment, must be produced by May 20.

Separately, by May 20, please provide all dates that you are available in June to attend your second day of deposition.

Michael F. Fleming

Morgan, Lewis & Bockius LLP

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From: Erika Lee <leeerikalatise@gmail.com>
Sent: Wednesday, May 14, 2025 1:34 PM
To: Fleming, Michael F. <michael.fleming@morganlewis.com>
Subject: Uncropped 3/30 email

[EXTERNAL EMAIL]

Hello ,

This is the uncropped full email and first and only notification (email) I ever received which advised me of 4/4 appointment.

CONFIDENTIALITY AND PRIVACY NOTICE: This email is from a law firm and may contain information that is confidential, privileged, and/or attorney work product. This email may also contain personal data, which we process in accordance with applicable data protection laws and our [Privacy Policies and Notices](#). If you are not the intended recipient, you may not review, copy, or distribute this message. If you have received this email in error, please contact the sender immediately and delete all copies from your system.